

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**CIVIL ACTION NO. 04D-10994-NMG**

**PARENTS OF DANIELLE,** )  
Plaintiff )  
v. )  
**MASS. DEPARTMENT OF** )  
**EDUCATION, ET AL.,** )  
Defendant )

ASSENTED TO MOTION  
TO CONTINUE SCHEDULING  
CONFERENCE FOR LEAVE  
TO WITHDRAW

NOW COMES counsel for the plaintiff in the above-referenced action and respectfully requests that this Honorable Court grant a continuance of the scheduling conference set for December 10, 2004, at 3:00 p.m.

As reasons therefor, counsel states that due to recent health problems of a family member, she will be unable to adequately represent the plaintiff in this matter.

WHEREFORE, counsel moves this Court to continue the scheduling conference to allow time for the plaintiff to employ successor counsel.

Respectfully submitted,

PARENTS OF DANIELLE,  
By their attorney,

ASSENTED TO:

Tammy Richardson (RNB)  
Tammy Richardson, Esquire  
Attorney for Sharon Public Schools  
Deutsch/Williams  
99 Summer Street  
Boston, MA 02110

Ruth N. Bortzfield, Esquire  
462 Boston Street, Suite 3  
Topsfield, MA 01983  
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Amy Spector (RWB)  
Amy Spector, Esquire  
Attorney for State Defendants  
Office of Attorney General  
One Ashburton Place  
Boston, MA 02108-1598

DATED: November 30, 2004

**CERTIFICATE OF SERVICE**

I, Ruth N. Bortzfield, attorney for the plaintiff herein, hereby state that on November 30, 2004, I served a copy of Assented to Motion to Continue Scheduling Conference for Leave to Withdraw on the defendants by mailing the same, via first class mail, postage prepaid, to the following attorneys:

Tammy Richardson, Esquire  
Attorney for Sharon Public Schools  
Deutsch/Williams  
99 Summer Street  
Boston, MA 02110

Amy Spector, Esquire  
Attorney for State Defendants  
Office of Attorney General  
One Ashburton Place  
Boston, MA 02108-1598

  
Ruth N. Bortzfield